

**LOCAL BANKRUPTCY FORM 9013-4**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

Morgen R. Hatton

**CHAPTER** 13

**CASE NO.** 5 - 19 -bk- 2509

**Debtor(s)**

THE BANK OF NEW YORK MELLON FKA  
THE BANK OF NEW YORK, AS TRUSTEE  
FOR THE CERTIFICATE HOLDERS OF THE  
CWALT, INC., ALTERNATIVE LOAN TRUST  
2007-HY8C MORTGAGE PASS-THROUGH CE

**ADVERSARY NO.**    -    -ap-     
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

Morgen R. Hatton

**Nature of Proceeding:** Motion for Relief

**Defendant(s)/Respondent(s)**

**Document #:**   

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

To allow brief time for Debtor to cure arrears.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 01/11/2023

*Mark Moulton*

Attorney for Morgen R. Hatton

Name: Mark E. Moulton

Phone Number: 570-775-9525

<sup>1</sup> No alterations or interlineations of this document are permitted.